

EXHIBIT 2

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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON, *et al*,

Defendants.

Case No.: 19-cv-01697-KJD-DJA

**DECLARATION OF DAVID SAFFRON IN SUPPORT OF DEFENDANT'S
MEMORANDUM IN OPPOSITION TO THE COMMODITY FUTURE TRADING
COMMISSION'S MOTION FOR ADDITIONAL SANCTIONS IN FURTHERANCE OF
CFTC'S NOTICE OF DEFENDANTS' NONCOMPLIANCE WITH THE COURT'S
CIVIL CONTEMPT ORDER DATED JANUARY 30, 2020**

I, David Saffron, declare as follows:

1. Acting on behalf of the company that came to be known as The Circle Society ("Company"), I and the Company have held or controlled several addresses which held some form of cryptocurrency in the past two years, from which addresses the Company has

participated in or directed transactions involving cryptocurrency in that same time period. None of those transactions involved any form of U.S. currency or non-cryptocurrency.

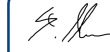
2. In the past two years, the Company has taken in a total of 6,884 Bitcoin from its clients for use in its cryptocurrency business transactions.

3. As I explained to the Court at the hearing held January 24, 2020, in the above-captioned matter, I have been endeavoring to not only provide responsive documents to the CFTC but to reconstruct the Company's data that was lost for various reasons, and to produce that information in a way that would be helpful in making everyone whole.

4. At the hearing and in the opposition memorandum filed herewith, I have explained the reasons for the delays experienced. Frustrating the Company's efforts further, the Circle Society's website administrator, who is a critical part of helping to reconstruct the Company's records, has been under quarantine in Italy for over a month, which has further frustrated my efforts because of how certain records I have been attempting to review and access in my efforts are subject to complex, "double key" security measures (where the administrator is the "second key").

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of March, 2020.

DocuSigned by:



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David Saffron